

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;  
Kristi NOEM, Secretary, U.S. Department of  
Homeland Security, in her official capacity; Pamela  
BONDI, U.S. Attorney General, in her official  
capacity; and Antone MONIZ, Superintendent,  
Plymouth County Correctional Facility, in his official  
capacity,

Defendants.

Case No. 25-cv-10676-BEM

**JOINT STIPULATION FOR AMENDED DISCOVERY SCHEDULE**

Plaintiffs D.V.D., M.M., E.F.D., and O.C.G. (Plaintiffs) and Defendants U.S. Department of Homeland Security (DHS), *et al.* (the parties) hereby stipulate to the following amended discovery schedule. On May 7, 2025, the Court ordered that the parties engage in certain limited discovery concerning (1) “the factual circumstances surrounding the removal of the four alleged class members identified in” Dkt. 72, (2) “the relationship between the Department of Homeland Security and the Department of Defense,” and (3) “the facts in the declaration of Tracy J. Huettl (Dkt. 72-1).” Dkt. 92 (“Order”). On May 30, 2025, the parties submitted a Proposed Protective Order (Dkt. 147) and on that same date, Defendants filed a Motion for Protective Order with respect to certain discovery requests. Dkt. 148. Because the parties are conferring in good faith to resolve their discovery disputes, Defendants hereby withdraw their pending motion (Dkt. 148), without prejudice to either party’s ability to raise discovery objections and bring any discovery

disputes to the Court's attention as necessary.

Furthermore, the parties have since conferred and agree to the following schedule to complete this discovery:

- **June 27, 2025:** Deadline for responses to written discovery requests and identification of the names and positions of DHS deponents.
- **July 13, 2025:** Deadline for final production of responsive documents with the agreement that DHS will serve productions on a rolling basis, as they become available, in advance of the deadline.
- **August 15, 2025:** Deadline for completion of DHS Rule 30(b)(6) deposition and depositions for DHS deponents.<sup>1</sup>

Additionally, the parties provide the following positions as they relate to discovery from the Department of Defense (DoD). Plaintiffs agree to first take discovery from DHS but reserve the right to seek discovery from the DoD as needed. Defendants will continue to object to DoD discovery as appropriate.

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<sup>1</sup> Because DHS continues to identify the appropriate deponents, Defendants reserve the right to further confer regarding the depositions as necessary.

Respectfully submitted,

s/Trina Realmuto

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

s/ Matthew P. Seamon  
MATTHEW P. SEAMON  
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Dated: June 12, 2025